

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAVID E. KAPLAN, et al.,

Plaintiffs,

- against -

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.
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No. 12 Civ. 9350 (VM) (KNF) (Kaplan)

ECF CASE

**REPLY DECLARATION OF ETHAN D. WOHL IN FURTHER SUPPORT OF
PLAINTIFFS' MOTION FOR RELIEF FROM PSLRA DISCOVERY STAY**

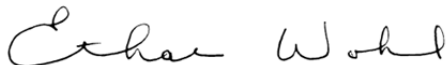
ETHAN D. WOHL, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm of Wohl & Fruchter LLP and a member of the Bar of this Court and submit this reply declaration in further support of the motion of Lead Plaintiffs David E. Kaplan, Roxy D. Sullivan, Lindsey Rankin, Michael S. Allen and Chi-Pin Hsu, together with plaintiff Gary W. Muensterman, for relief from the discovery stay provided by the Private Securities Litigation Reform Act of 1995.

2. Attached hereto as Exhibit F is a true and correct copy of the Protective Order on Consent entered in *United States v. Martoma*, No. 12 Cr. 973 (PGG) (S.D.N.Y.), ECF No. 9.

I declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
July 3, 2013



Ethan D. Wohl